

**Bruce P. Beausejour**

Vice President and General Counsel – New England

185 Franklin Street, 13<sup>th</sup> Floor  
Boston, MA 02110

Tel (617) 743-2445  
Fax (617) 737-0648  
bruce.p.beausejour@verizon.com

February 24, 2005

Mary L. Cottrell, Secretary  
Department of Telecommunications & Energy  
Commonwealth of Massachusetts  
One South Station, 2<sup>nd</sup> Floor  
Boston, MA 02110

**Re: D.T.E. 03-60 / D.T.E. 04-73**

Dear Secretary Cottrell:

In its December 15, 2004, Order in the above-referenced proceeding, the Department requested comments regarding the possible adoption in Massachusetts of a recent New York Public Service Commission's decision regarding hot cuts (Order at pages 35-36).

On January 18, 2005, Verizon MA filed with the Department revised Carrier-to-Carrier Guidelines pertaining to Hot Cuts including Large Job and Batch Hot Cut processes. These revised Guidelines were filed with the New York PSC on January 6, 2005.<sup>1</sup> In that letter, Verizon MA pointed out that it would make Large Job and Batch Hot Cut processes available in Massachusetts on the same basis as in New York upon CLEC request and execution of an amendment to its interconnection agreement.

---

<sup>1</sup> On February 4, 2005 Verizon NY filed a compliance filing with the New York PSC's January 21, 2005 Order in Case 02-C-1425.

On February 4, 2005, Verizon MA recommended that the Department allow CLECs to evaluate the New York processes and procedures for adoption in Massachusetts and, to the extent that a CLEC is interested in taking advantage of the processes, allow the CLEC and Verizon MA to execute an appropriate amendment to their interconnection agreement.

Attached to this letter is a description of the Wholesale Provisioning Tracking System ("WPTS"). This system is utilized in the Verizon East states, including both Massachusetts and New York. Verizon MA proposes to provide "Basic" two and four-wire hot cuts on the same basis as in New York upon CLEC request and execution of an amendment to its interconnection agreement.

To save the Department and all parties from expending resources to litigate rates, Verizon MA is willing to charge the same rates for the Basic hot cuts using WPTS as the rates recently approved by the New York Public Service Commission. Those rates are \$42.53 for initial two-wire loops and \$69.87 for initial four-wire loops; the corresponding expedited rates are \$100.32 and \$127.66. The rates for additional loops are \$29.54 for two-wire loops and \$45.26 for four-wire loops; the corresponding expedited rates are \$87.33 and \$103.05. The Basic hot cut rates approved by the Department in D.T.E. 01-20 without the benefit of the WPTS process are \$87.81 for an initial two-wire loop and \$96.19 for an initial four-wire loop; the corresponding expedited rates are \$127.51 and \$139.53. The Department approved rates for additional loops are \$65.12 for two-wire loops and \$82.24 for four-wire loops; the corresponding expedited rates are \$94.82 and \$119.31. This is a reasonable approach that makes the more efficient WPTS process available immediately at rates that are significantly lower than the non-WPTS Basic rates adopted by the Department and that have been determined to be reasonable.

Sincerely,

/s/Bruce P. Beausejour

Bruce P. Beausejour

cc: Michael Isenberg, Director--Telecommunications Division  
Paula Foley, Esquire  
Jesse Reyes, Esquire  
April Mulqueen, Assistant Director--Telecommunications Division  
Service Lists (D.T.E. 03-59, 03-60 and 04-73)